



Lujan, Elaine <elujan@nmag.gov>

## HSD motion for SJ - page limit for exhibits

3 messages

Lujan, Elaine <elujan@nmag.gov>

Wed, May 12, 2010 at 10:33 AM

To: Allegra Chapman <achapman@demos.org>, David H Urias <DHU@fbdlaw.com>, Mark Posner <mposner@lawyerscommittee.org>, Yolanda Sheffield <ysheffield@projectvote.org>  
Cc: Adrian Terry <aterry@nmag.gov>, Scott Fuqua <SFuqua@nmag.gov>

Colleagues -

We intend on filing a motion for summary judgment on behalf of HSD. The exhibits we intend on filing in support of the motion equal 77 pages, which exceeds the 50 page limit for exhibits. The majority of the exhibits generally consist of portions of the transcript from Ted Roth's deposition and documents that you have already been provided with through discovery (i.e. the GI's, voter registration reports, etc.).

I assume that you are opposed to the motion, but we would like to gain your consent to file the 77 pages of exhibits. Please let us know if you are agreeable to this as soon as possible as we would like to file the motion today.

Thanks,  
Elaine

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New Mexico Attorney General's Office  
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Mark Posner <mposner@lawyerscommittee.org>

Wed, May 12, 2010 at 12:07 PM

To: "Lujan, Elaine" <elujan@nmag.gov>, Allegra Chapman <achapman@demos.org>, David H Urias <DHU@fbdlaw.com>, Yolanda Sheffield <ysheffield@projectvote.org>, Bob Kengle <bkengle@lawyerscommittee.org>, Brian Maloney <bmaloney@lawyerscommittee.org>, "Kam, Laura" <Laura.Kam@dlapiper.com>  
Cc: Adrian Terry <aterry@nmag.gov>, Scott Fuqua <SFuqua@nmag.gov>

Elaine,



We do not oppose your request to file 77 pages of exhibits, however, if the exhibits include any documents

which you should have provided to us previously through discovery but have not, then we reserve the right to move to strike them from consideration in connection with your motion.

Mark Posner

Senior Counsel

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**From:** Lujan, Elaine [mailto:elujan@nmag.gov]

**Sent:** Wednesday, May 12, 2010 12:34 PM

**To:** Allegra Chapman; David H Urias; Mark Posner; Yolanda Sheffield

**Cc:** Adrian Terry; Scott Fuqua

**Subject:** HSD motion for SJ - page limit for exhibits

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**Lujan, Elaine** <elujan@nmag.gov>

**Wed, May 12, 2010 at 4:23 PM**

To: Mark Posner <mposner@lawyerscommittee.org>

Okay, thanks for the quick response Mark. Our server has been down at work all day so we will likely file our motion tomorrow.

Elaine

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Sent from my mobile device

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